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JUDGE: The Honorable Timothy Dore
DATE: June 23, 2017
TIME: 9:30 a.m.
CHAPTER: 13
RESPONSE DATE: June 16, 2017

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7 IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE

8 In Re the Matter of:

NO. 16-15552-TWD

9 GITA ANSARI,

**MOTION CONFIRMING THERE IS
NO STAY IN EFFECT AS TO
DEBTOR**

10 Debtor.
11

12 **I. RELIEF REQUESTED**

13 Amir Nassiri, an unlisted creditor of the debtor herein, moves the court for an order
14 confirming there is no stay in effect as to the Debtor based on the following:

15 1. Previous Filing – 11 U.S.C. Sec. 362(c)(3)(A). The Debtor previously filed for
16 bankruptcy protection on May 29, 2015, under case number 15-13369-TWD, and it was
17 dismissed on May 19, 2016.

18 **II. BASIS FOR RELIEF**

19 On December 13, 2016, the Court entered an Order Denying Stay Extension and held
20 that “[t]he automatic stay imposed under 11 U.S.C. § 362(a) remains in effect over all property
21 of the estate. In re Rinard, 451 B.R. 12 (Bankr. C.D. Cal. 2011).” The debtor is a third-party
22 defendant in a King County, Washington Superior Court lawsuit (Case No. 16-2-01257-4). Mr.
23 Nassiri seeks confirmation that he may continue to pursue his claims against the debtor.

24 MOTION CONFIRMING THERE IS NO STAY IN EFFECT AS TO
DEBTOR - Page 1


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III. CONCLUSION

For the reasons set forth above this motion should be granted.

DATED this 31st day of May, 2017.

INSLEE, BEST, DOEZIE & RYDER, P.S.

By /s/ Christopher W. Pirnke

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